

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
KANSAS CITY DIVISION

IN RE:)	
)	
LAKESHORE FARMS, INC.,)	Case No 18-50077-btf11
)	Chapter 11
Debtor.)	
_____)	

WITNESS AND EXHIBIT LIST OF LAKESHORE FARMS, INC

Debtor, Lakeshore Farms, Inc., submits the following list of witnesses who may be called and exhibits which may be offered at the hearing to be conducted on March 26, 2018, commencing at 1:00 p.m.

WITNESSES

1. Jonathan Russell, President of Lakeshore Farms, Inc.
2. Any witness called or listed by any other party in interest.
3. Any witness necessary for rebuttal.

EXHIBITS

1. Budget, in substantially the form provided with this pleading.
2. Any Exhibit identified by any other party.
3. Any Exhibit for the purpose of impeachment or rebuttal.

Lakeshore Farms, Inc. reserves the right to request that the Court take judicial notice of appropriate matters, including but not limited to the record in this matter.

Respectfully Submitted:

EVANS & MULLINIX, P.A.

/s/ Joanne B. Stutz

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Attorneys For Debtor

LAKESHORE FARMS, INC.
Nine Month Budget

<u>Source</u>	<u>Purpose</u>	<u>Mar-18</u>	<u>Apr-18</u>	<u>May-18</u>	<u>Jun-18</u>	<u>Jul-18</u>	<u>Aug-18</u>	<u>Sep-18</u>	<u>Oct-18</u>	<u>Nov-18</u>
ARM	Land Leases	\$ 1,724,583.00								
CC	Labor	\$ 18,000.00								
CC	Fuel	\$ 20,000.00								
CC	Repairs	\$ 19,000.00								
CC	Farm Bureau	\$ 2,300.00								
Co-Dist	Seed		\$ 217,076.00							
Co-Dist	Herbicide		\$ 225,239.00							
ARM	Labor		\$ 7,000.00							
CC	Leases		\$ 73,163.00							
ARM	Fuel		\$ 20,000.00							
CC	Repairs		\$ 19,000.00							
CC	Veh. Paymt		\$ 3,250.00							
CC	Farm Bureau		\$ 2,300.00							
Co-Dist	Herbicide			\$ 84,029.00						
ARM	Labor		\$ 7,000.00							
ARM	Fuel		\$ 10,000.00							
ARM	Repairs		\$ 5,000.00							
CC	Veh. Paymt		\$ 3,250.00							
CC	Farm Bureau		\$ 2,300.00							
ARM	Labor			\$ 7,000.00						
ARM	Fuel			\$ 5,000.00						
ARM	Repairs			\$ 2,500.00						
ARM	Irrigation			\$ 10,000.00						
CC	Veh. Paymt			\$ 3,250.00						
ARM	Farm Bureau			\$ 2,300.00						
CC	Irrigation				\$ 15,000.00					
CC	Veh. Paymt				\$ 3,250.00					
CC	Farm Bureau				\$ 2,300.00					
ARM	Labor					\$ 7,000.00				
ARM	Fuel					\$ 5,000.00				
ARM	Irrigation					\$ 15,000.00				
CC	Veh. Paymt					\$ 3,250.00				
CC	Farm Bureau					\$ 2,300.00				
ARM	Labor						\$ 7,000.00			
ARM	Fuel						\$ 5,000.00			
ARM	Irrigation						\$ 15,000.00			
CC	Veh. Paymt						\$ 3,250.00			
CC	Farm Bureau						\$ 2,300.00			
ARM	Labor							\$ 7,000.00		
ARM	Fuel							\$ 5,000.00		
ARM	Irrigation							\$ 15,000.00		
CC	Veh. Paymt							\$ 3,250.00		
CC	Farm Bureau							\$ 2,300.00		
ARM	Labor								\$ 7,000.00	
ARM	Fuel								\$ 5,000.00	
ARM	Irrigation								\$ 15,000.00	
CC	Veh. Paymt								\$ 3,250.00	
CC	Farm Bureau								\$ 2,300.00	
ARM	Labor									\$ 7,000.00
ARM	Fuel									\$ 5,000.00
ARM	Irrigation									\$ 15,000.00
CC	Veh. Paymt									\$ 3,250.00
CC	Farm Bureau									\$ 2,300.00

LAKESHORE FARMS, INC.
Nine Month Budget

Source	Purpose	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	
ARM	Labor								\$ 7,000.00		
ARM	Fuel								\$ 20,000.00		
ARM	Repairs								\$ 10,000.00		
CC	Veh. Paymt								\$ 3,250.00		
CC	Farm Bureau								\$ 2,300.00		
ARM	Land Leases									\$ 115,000.00	
ARM	Labor									\$ 3,000.00	
ARM	Harvesting									\$ 245,086.00	
ARM	Fuel									\$ 20,000.00	
ARM	Repairs									\$ 9,000.00	
CC	Veh. Paymt									\$ 3,250.00	
CC	Farm Bureau									\$ 2,300.00	
CC	Legal Fees	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	
CC	Consult Fees	\$ -	\$ 500.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	
CC	Qty Fees	\$ 6,500.00				\$ 4,875.00			\$ 975.00		
Mo. Totals		\$ 1,800,383.00	\$ 577,528.00	\$ 121,879.00	\$ 40,350.00	\$ 50,225.00	\$ 42,850.00	\$ 27,850.00	\$ 53,825.00	\$ 407,936.00	\$ 3,122,826.00
Total Use of Funds											
Legal/ust fees	Land Leases	Seed	Herbicide	Labor	Leases	Harvesting	Fuel	Repairs	Irrigation	Vehicle Payments	Farm Bureau
\$94,650.00	\$1,839,583.00	\$217,076.00	\$309,268.00	\$70,000.00	\$73,163.00	\$245,086.00	\$110,000.00	\$68,000.00	\$40,000.00	\$26,000.00	\$26,694.18
Total Sources of Funds by Month											
ARM		\$ 1,724,583.00	\$ 27,000.00	\$ 22,000.00	\$ 24,500.00	\$ 29,500.00	\$ 27,000.00	\$ 12,000.00	\$ 37,000.00	\$ 392,086.00	\$ 2,295,669.00
CC		\$ 75,800.00	\$ 108,213.00	\$ 15,850.00	\$ 15,850.00	\$ 20,725.00	\$ 15,850.00	\$ 15,850.00	\$ 16,825.00	\$ 15,850.00	\$ 300,813.00
Co-Dist		\$ -	\$ 442,315.00	\$ 84,029.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 526,344.00

qtlly fee calc July Oct
\$ 739,757.00 \$ 120,925.00

The Vehicle Payments are for the following:

2015 F350, secured to Union Bank
2016 F350 secured to TD
the Escalade secured to TD

Hauling Grain concludes in or about November or December. Debtor anticipates that the net income, after paying the DIP loan, will approximate \$350,000 to \$500,000.00.